

# COVINGTON & BURLING

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February 14, 2005

## FILED ELECTRONICALLY

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45  
*Ex Parte* Notice

Dear Ms. Dortch:

This letter is submitted pursuant to Section 1.1206(b)(2) of the Commission's Rules to provide notice of a permitted oral *ex parte* communication in the above-referenced proceeding. On February 11, 2005, Jay Driscoll of the Western Telecommunications Alliance (WTA), Stuart Polikoff of the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), David Zesiger on behalf of the Independent Telephone and Telecommunications Alliance (ITTA), and Kathleen Wallman and the undersigned on behalf of TDS Telecommunications Corp. (TDS Telecom) met with Jessica Rosenworcel, Legal Advisor to Commissioner Michael Copps.

The parties discussed issues raised in recent *ex parte* letters concerning the process for designating eligible telecommunications carriers (ETCs) entitled to receive support from the Universal Service Fund.<sup>1</sup> Specifically, we focused on the need for the Commission to establish concrete minimum eligibility criteria and review procedures for ETC applicants in areas served by rural telephone companies. These measures are necessary to promote accountability in the Fund and to ensure that universal service support is being used for the purposes intended by Congress. We further discussed the need to develop enforcement procedures pursuant to which ETCs could temporarily be denied funding or could have their designation revoked for failure to comply with the ETC designation criteria and commitments on an ongoing basis.

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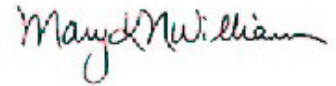
<sup>1</sup> See *Ex Parte* Letter from Various Associations and Telephone Companies to Marlene H. Dortch, Secretary, FCC, CC Docket No. 96-45 (Jan. 28, 2005); *Ex Parte* Letter from Stuart Polikoff, OPASTCO, to Marlene H. Dortch, Secretary, FCC, CC Docket No. 96-45, Attachment (Feb. 1, 2005).

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Please address any questions to the undersigned.

Sincerely,

A handwritten signature in dark ink, appearing to read "Mary Newcomer Williams". The signature is fluid and cursive, with the first name "Mary" and last name "Williams" clearly distinguishable.

Mary Newcomer Williams  
*Counsel to TDS Telecom*

cc: Ms. Jessica Rosenworcel